
ENVIRONMENTAL ASSESSMENT (EA)

SECTION 4B LAND USE CHANGE

SOUTH PARK

FOR

HOUSTON, MINNESOTA

FOR PUBLIC COMMENT

SEPTEMBER 11, 2013

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I. PURPOSE, NEED, BACKGROUND

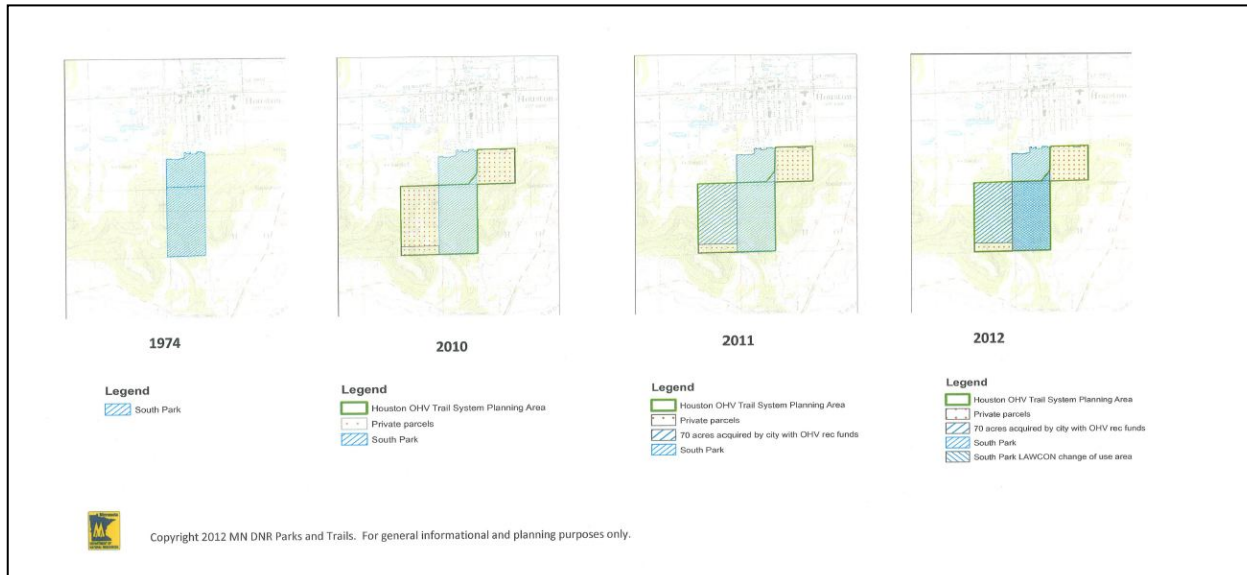
The Land and Water Conservation Fund (LWCF) Act of 1965 (Public Law 88-578, 78 Stat 897) was enacted to “...to assist in preserving, developing, and assuring accessibility to all citizens of the United States of America of present and future generations and visitors who are lawfully present within the boundaries of the United States of America such quality and quantity of outdoor recreation resources as may be available and are necessary and desirable for individual active participation in such recreation and to strengthen the health and vitality of the citizens of the United States by (1) providing funds for authorizing federal assistance to the States in planning, acquisition, and development of needed land and water areas and facilities and (2) providing funds for the federal acquisition and development of certain lands and other areas.”

The LWCF Act requires the States to operate and maintain by acceptable standards the properties or facilities acquired or developed for public outdoor recreation use. Further, Section 6(f)(3) of the LWCF Act requires that no property acquired or developed with LWCF assistance shall be converted to other public outdoor recreation uses without the approval of the Secretary of the Department of Interior, and only if he/she finds it to be in accord with the then existing State Comprehensive Outdoor Recreation Plan (SCORP) and only upon such conditions as he/she deems necessary to assure the substitution of other recreation properties of at least equal fair market value and of reasonably equivalent usefulness and location (36 CFR 59).

States are responsible for ensuring, on behalf of the National Park Service (NPS), proposals submitted to the NPS for federal decisions, including new applications and amendments for the LWCF previously-approved projects such as conversions, temporary non-conforming uses, and public facility exceptions, are developed in accordance with all applicable federal, state, and local laws and regulations. The federal legislation that coordinates the consideration of the potential for impacts to the human environment as a result of a federal action is the National Environmental Policy Act (NEPA). The NEPA process coordinates compliance with applicable related federal, state, and local environmental requirements. To facilitate and document this coordination, States must ensure that the LWCF Proposal Description and Environmental Screening Form (PD/ESF) is completed and accompanies each LWCF proposal submitted for federal review and decision.

SOUTH PARK

The South Park Project (Project) is located in Houston County in Section 4 of Township 103N, Range 6W (**Figure 1-3**). It is located along the southern edge of the City of Houston generally south of South Grant Drive, north of County Road 4, and west of County Road 76. South Park was developed in 1974 with LWCF assistance. In 1974, South Park consisted of 118 acres of land.



South Park offers a wide spectrum of active and passive outdoor recreation opportunities including:

- Picnicking
- Camping
- Conservation-primitive camping
- Walking
- Cross-country skiing
- Sliding
- Biking
- Hiking

This EA reviews only the 80 acres of land developed using LWCF assistance that is being considered for motorized recreational use. The remaining 38 acres in the 6(f) boundary will continue to offer passive recreational uses as mentioned above.

The immediate surrounding land use is primarily single family housing, park and open space, and some agricultural land uses (**Figure 4 – Land Use Map**). South Park serves the entire Houston community. Approximately 979 people live within the city. In addition to being a draw for residents, South Park attracts visitors from other communities that are drawn to the amenities the park offers.

PURPOSE/NEED

The City of Houston is seeking approval for a permanent change to the land use designation in the southern 80-acre portion of the 118 acre LWCF parcel of South Park from its existing land use designation. The current land use designation allows for strictly non-motorized uses; the proposal is to allow a motorized off-highway vehicles (OHV) trail system. This review is only to review the impacts associated with a change in land use designation, not a review of an actual trail system. At this phase in the Project development, no trail alignments have been designated, but the conversion of land uses on the LAWCON property requires an environmental review. The purpose of the change in use to allow off-highway vehicle (OHV) uses within South Park is to provide park visitors with a range of passive and active recreational opportunities. The need for this change has been requested by recreational users in Minnesota who are seeking recreational opportunities to for OHV activities.

The request for conversion is in accordance with the State Comprehensive Outdoor Recreation Plan (SCORP). An important goal of the 2008-2012 SCORP is to increase participation in outdoor recreation by all Minnesotans and visitors. As part of this, it is recognized that change in demographics, economics, land use, environment and culture will require changes in how outdoor recreation areas are planned, designed, funded, developed, managed and promoted. As evident by the request for the proposed land use change, the desires of OHV recreational in the region for the use of motorized trail uses has prompted the request for change in use. Another important goal is outlined in "Strategy #3" of the SCORP, which aims to "promote increased outdoor recreation participation through targeted programming and outreach". As demonstrated in the Environmental Screening Form, the change in land use designation within South Park physically does not have an environmental impact on the park at this time. However, if the change in land use is approved and an actual trail project moves forward, environmental impacts could occur if the trail is not sited properly. Careful trail siting and possible additional environmental review will be needed if a trail project is proposed. See *Chapter III: Affected Environment* for detailed information.

II. DESCRIPTION OF ALTERNATIVES

Two alternatives have been considered in this EA. Both the No Action Alternative and the Proposed Alternative were assessed and analyzed during preparation of this document.

PROPOSED ALTERNATIVE

The proposed action is to allow motorized recreational within South Park. This proposal was developed through the interest of the public via OHV groups as well as public input. The city has considered what uses, both active and passive outdoor recreation are appropriate within South Park. Discussions among DNR Parks and Trails, the City of Houston, Houston County, and OHV recreational groups led to the decision by three organized clubs to apply to the city for a formal grant-in-aid (GIA) off highway vehicle (OHV) trail system near Houston in July 2010. In an effort to move quickly on acquisition to take advantage of current favorable economic conditions and limited-duration landowner interest, the clubs prepared grant-in-aid applications for acquisition activities only, deferring the more common components of GIA applications (such as proposals for specific trail layout/development work). The DNR Parks and Trails staff and representatives from the clubs provided information on the proposal at a city hearing on August 9, 2010,

and on August 23, 2010 the Houston City Council passed resolutions approving sponsorship for the off-road vehicle (ORV) and off-highway motorcycle (OHM) acquisition applications. The applications were then forwarded to DNR in late August for approval and processing.

After receiving the GIA applications from the city, the DNR Parks and Trails regional staff met to discuss next steps. While it appeared likely that a sustainable motorized trail system was feasible in the area, the division staff requested an interdisciplinary DNR team ‘coarse filter’ review of the area within the city-approved project boundary prior to the expenditure of acquisition funds. Because the Blufflands possess unique natural features, environmental protection is particularly important, the Parks and Trails regional team decided a proactive approach to identify potential concerns earlier in the process was judicious. Field visits were held on October 7 and 29, 2010 to allow interested area team staff to assess portions of the project area of interest or concern to them. Thirteen staff from four DNR divisions (Ecological and Water Resources, Fish and Wildlife, Forestry, and Parks and Trails) attended one or both days of exploration. On both days, Tony Schultz, son of landowners in the project area and a city councilman, visited with the area team and accompanied them for portions of the site visit.

All visiting staff asked questions and provided oral comments, and several staff provided written comments. Parks and Trails staff then met to review the comments at the regional level, involving DNR Central Office and program staff as appropriate, to integrate the comments into the established GIA process. The meetings culminated in a Parks and Trails presentation to the DNR Central Regional Management Team (RMT) on December 6, 2010. The RMT expressed support for the process by which the project is advancing, and requested they be kept informed on progress.

To obtain public input on the proposed changes in land use at South Park, the City of Houston held a public hearing on July 9, 2012 to present information relevant to a change of use for the portion of South Park within the Project area. The change of use would allow motorized trail uses (OHV – that is, ATV, 4x4, and/or off highway motorcycle). Public testimony was given and recorded; comments were both pro and con the consideration of a change of use to potentially allow motorized use there in the future. A summary of these comments are included in **Appendix C**.

The proposed alternative would put in motion a change of recreational land use within South Park, but would not necessarily result in a trail ever being developed. Development of trails for the project would happen within the GIA funding process, if the proposed change in use is approved by the City, DNR and NPS. At that time, a detailed and well-established process would occur for the exact location and layout of a trail network as well as additional environmental review.

While this EA evaluates the proposed land use change only and not a specific trail alignment, if any future trail alignments are proposed, additional environmental review may be necessary. Additionally, any proposed trail alignments would be based on the Minnesota Department of Natural Resource’s nationally recognized ***Trail Planning, Design, and Development Guidelines (2006, MnDNR)***. The City and MnDNR know that bringing a strong knowledge base about good trail design will be key to this project because, if

done without proper attention to sound trail design techniques, environmental problems could occur on the steep slopes involved in the project area. In particular, the knowledge base contained in the Trail Planning document (Section 6 “Sustainable Natural Surfaced Trails”) will be important to planning the future trail system.

In addition to the expertise of MnDNR professionals for possible trail alignments, the project will have access to the resources of the National Off Highway Vehicle Conservation Council (NOHVCC). NOHVCC cooperated with MnDNR in putting on an OHV Recreation Management Workshop in Houston in June 2011, and NOHVCC staff and volunteers are knowledgeable about the project. It is likely that the project would contract with nationally recognized professional trail designers from the 2011 workshop to assist working through sustainable trail design issues.

NO ACTION ALTERNATIVE

Under the no action alternative, a public park containing motorized recreational uses as previously detailed would not be permitted at the Project area. This would not meet the purpose and need of to provide park visitors with a range of passive and active recreational opportunities

III. AFFECTED ENVIRONMENT

This section of the EA provides analysis for the affected environment based on the proposal to change the land use to add motorized vehicle use to South Park. Information from the environmental screening form and other resources were used in this analysis.

Overall the existing South Park is a 118-acre community park that includes both active and passive recreational opportunities for visitors. Of this amount, 80 acres are being considered for motorized recreational use. Within the area proposed for change in use, there are trails for hiking and horseback riding and areas of open space that are mainly wooded. The trails are used for hiking and horseback riding. Because there are no plans for trail alignment and design at this stage in the request, the existing natural resources will not be impacted by the change in land use. However, if the change in land use is approved and an actual trail project moves forward, environmental impacts could occur if the trail is not sited properly. Careful trail siting and possible additional environmental review will be needed if a trail project is proposed.

GEOLOGIC RESOURCES

The Project site is located on hilly, bluff terrain. Much of the upland area in general vicinity is bedrock, made up of distinct layers that include, from top to bottom:

- The cap that makes up the top of the ridge is dolostone and dolomitic sandstone of the Prairie du Chien group. This rock unit is resistant and has documented sinkholes in the regional area including one approximately one mile west of the site.
- Jordan Sandstone underlies the Prairie du Chien. The Jordan Sandstone unit is very soft quartz sandstone and is exposed mostly in near-vertical bluffs. Where it is not vertical it is easily eroded. This unit is approximately 80 to 100 feet thick, so the location of Jordan Sandstone can

be approximated by the occurrence of cliffs of this size near the top of the slope, or roughly between the 1000 and 1100 foot contours.

- St. Lawrence Formation is composed of 60 to 80 feet of sandy siltstone and dolostone. This rock unit is more resistant than the Jordan, especially at the bottom of the unit. These rocks do not form cliffs like the Jordan but are not thick enough to form a flat bench.
- The Lone Rock Formation is composed of gray, green, and yellow sandstone and shale that is approximately 130 feet thick. The top 10 and bottom 30 feet may also have pink to orange dolostone in places. This rock unit forms the lower part of the slope and appears to be draped with a skirt of eroded rock material (sand, gravel, cobbles, and boulders) from the rock units above. These rocks are often highly erodible where exposed.
- The bottom-most exposed rock unit at the site is the Wonewoc Sandstone. This is a soft white to tan quartz sandstone that is exposed at the toe of the bluff and is locally mined. It is highly erodible where it is exposed, although there are apparently few exposures on this site.

The bottom slope is composed of unconsolidated sand, gravel, clay, and organics as colluvium eroded from the uplands and alluvium from the nearby streams. This sediment is highly erodible.

AIR QUALITY

A general review of the air quality of the region was conducted using existing data from regional monitoring stations. Data reviewed came from US Environmental Protection Agency, Minnesota Pollution Control Agency, Houston County and other available databases. The nearest air quality data closest to the site was approximately 15-17 miles away. Pollutants of concern are PM_{2.5} (particles less than or equal to 2.5 micrometers) and PM₁₀ (particles less than or equal to 10 micrometers). From the data, these pollutants are below the National Ambient Air Quality Standards (NAAQS).

SOUND

Noise monitoring was conducted in the Project area. The full results of the monitoring are included in **Appendix E**. In Minnesota, the MPCA State Noise Standards restrict noise levels to 65/60 dBA (L10/L50) during the daytime and 55/50 dBA during the nighttime. The analysis indicates that the current noise levels in South Park are below the State Noise Standards with the exception of one location that exceeds the Standards by less than one (1) dBA, which is not perceptible by the human ear.

WATER QUALITY/QUANTITY

There are no water bodies within the Project area. Storm water from the Project area runs down the slope to surrounding streams where it eventually enters the South Fork of the Root River and the Root River. These rivers are more than 0.5 miles from the Project area.

LAND USE PATTERNS

The existing land use is non-motorized recreational uses. The Project area is completely surrounded by other park and open space on all four sides with residential outside of that. The Project proposes to maintain recreational land uses in the Project site and add OHV uses to the recreational facility.

FISH, WILDLIFE, AND ECOLOGICALLY SENSITIVE RESOURCES

There are no Minnesota DNR Wildlife Management Areas, State Natural Areas, or US Fish and Wildlife Services National Wildlife Refuges or Waterfowl Production Areas or other publically managed wildlife habitats within or adjacent to South Park. The Project area does contain a dry bedrock bluff prairie and

oak/sugar maple forest which are within areas listed as having a moderate biodiversity significant by the DNR (see **Figure 5**). A review of the Minnesota DNR licensed Natural Heritage Information System (NHIS; License # LA-579, issued May 16, 2011) revealed several rare species within an approximate one mile radius of the Project area (**Appendix B**). A review of the USFWS Section 7 Consultation Technical Assistance website was also conducted as part of this process. While two federally endangered and candidate species are found within the County, neither has habitat that is present within the Project area. The rare features found in proximity to the Project area are summarized in **Table 1**.

Table 1: Results of Rare Features Review (for Features within 1 mile of the Project area)

Feature	Location	State Rank	Federal Rank
Crystal darter (<i>Ammocrypta asprella</i>)	T104N, S32	Special Concern	N/A
Henslow's sparrow (<i>Ammodramus henslowii</i>)	T104N, S34	Endangered	N/A
Splendid tiger beetle (<i>Cicindela splendida cyanocephalata</i>)	T103N, S4, 8, & 9	Special Concern	N/A
Timber rattlesnake (<i>Crotalus horridus</i>)	T103N, S33	Threatened	N/A
Jewelled shooting star (<i>Dodecatheon amethystinum</i>)	T103N, S4, 5, 8, & 9	No Status	
Blanding's turtle (<i>Emydoidea blandingii</i>)	T104N, S32 & 33; T103N, S5	Endangered	N/A
Rattlesnake-master (<i>Eryngium yuccifolium</i>)	T103N, S9	Special Concern	N/A
Rough avens (<i>Geum laciniatum</i> var <i>trichocarpum</i>)	T103N, S9	No Status	N/A
American brook lamprey (<i>Lampetra appendix</i>)	T103N, S8 & 9	No Status	N/A
American ginseng (<i>Panax quinquefolius</i>)	T103N, S4 & 5	Special Concern	N/A
Purple cliff-brake (<i>Pellaea atropurpurea</i>)	T103N, S4, 5, 8, & 9	Special Concern	N/A
Dry Bedrock Bluff Prairie	T103N, S5 & 8	--	--
Red Oak –White Oak – Sugar Maple Forest	T103N, S4 & 5	--	--

INVASIVE SPECIES

Based on a review by Department of Natural Resources staff summarized in the letter dated January 29, 2011 (**Appendix B**), the lower elevations of the area do contain invasive species such as buckthorn, honeysuckle, barberry, and others. The higher elevations contain mostly natives with only scattered invasive species.

HISTORICAL/CULTURAL RESOURCES

The State Historical Preservation Office (SHPO) database was consulted (**Appendix B**). Based on this information, there are no historical, cultural, or architectural resources within the Project area.

Information from the DNR letter dated January 28, 2011 (**Appendix B**) indicates that there may be areas within the Project site that merit further investigation if a trail is proposed. Coordination with SHPO indicated in a letter dated May 31, 2013 that additional review was needed. A Phase 1 Archaeological Survey was completed in July 2013 that indicated there were no historic properties. The SHPO concurred with this finding in a letter dated September 5, 2013. Correspondence with SHPO is in **Appendix B** and the archaeological report is in **Appendix D**.

SOCIOECONOMICS

The Project will only affect the use designation of the park to add OHV. It will not impact any private residential, commercial, office or industrial properties. There are no low income or minority populations in the Project area itself. There are minority populations (Native American) within the regional area. No change in access is proposed with this project proposal.

NOT APPLICABLE RESOURCES

The following are the list of resources that are not in the project area:

- Stream flow
- Marine/estuarine
- Floodplains/wetlands
- Circulation/transportation
- Unique ecosystems (World Heritage Site)
- Unique fish habitat
- Energy resources
- Other agency plans or policies
- Land/structures with history of contamination
- Other important environmental resources to address

IV. ENVIRONMENTAL IMPACTS

This chapter of the EA analyzes the degree to which the resources described in the preceding chapter (*Chapter III – Affected Environment*) will be impacted by the proposal. This chapter also includes a discussion of the proposed impacts, both beneficial and adverse, on the provisions of public outdoor recreation for the populations served, including minority and low- income populations.

As noted previously, the proposed change in allowable uses within South Park impacts a total of 80 acres of the 118-acre park area. The area proposed for use change is located in the southeastern portion of the overall park area. As previously mentioned, the current Project involves only a change in allowable land use from non-motorized transportation activities to allowing OHV. No OHV trail alignments have been proposed at this time. Because there are no plans for trail alignment and design at this stage in the request, the existing natural resources will not be impacted by the change in land use. However, if the change in land use is approved and an actual trail project moves forward, environmental impacts could occur if the

trail is not sited properly. Careful trail siting and possible additional environmental review will be needed if a trail project is proposed.

This section includes a description of the resource (from Chapter III) and provides a discussion for the impact to that resource. Please note resources noted as not applicable on the environmental screening form are not included in this chapter.

GEOLOGIC RESOURCES

As indicated in Section III, the Project site is located on hilly, bluff terrain. Most of the Project site is made up of highly erodible material. The proposed change in land use for the Project will not itself result in increased erosion and therefore there are no impacts from the Project. However, given the 500- foot relief of the site and soils present, actual motorized vehicle use on trails may cause erosion. If trails are planned in the future and motorized vehicle use is to be permitted, additional review and design considerations will be necessary.

AIR QUALITY

Air quality data for Houston County indicates that pollutants are below the National Ambient Air Quality Standards (NAAQS). The proposed Project to change the land use will not have any impact on air quality. Additionally, if trails are proposed in the future, the total pollutant contributions from recreational off-road vehicles are very insignificant contributors to total particulate emissions in the County and will not impact air quality in the County. The majority of particulate emissions in the County are from agricultural activities.

SOUND

Noise monitoring was conducted in the Project area. The full results of the monitoring are included in **Appendix E**. In Minnesota, the MPCA State Noise Standards restrict noise levels to 65/60 dBA (L10/L50) during the daytime and 55/50 dBA during the nighttime. The analysis indicates that the current noise levels in South Park are below the State Noise Standards with the exception of one location that exceeds the Standards by less than one (1) dBA, which is not perceptible by the human ear. A change in land use alone will not result in any increased noise in the area. If trail alignments are proposed in the future, OHW trail additional review will likely be necessary.

WATER QUALITY/QUANTITY

There are no water bodies within the Project area. Storm water from the Project area runs down the slope to surrounding streams where it eventually enters the South Fork of the Root River and the Root River. These rivers are more than 0.5 miles from the Project area. The proposed change in land use for the Project will not itself result in impacts to water quantity and quality. While the land use change will not result in impacts, trail planning, design, construction, monitoring, and maintenance will be important if any trail implementation moves forward. Water quality is a concern for the community and the Root River should be carefully protected during any trail planning and implementation process.

LAND USE PATTERNS

The Project proposes to maintain recreational land uses in the Project site and add OHV uses to the recreational facility. The Project area is completely surrounded by other park and open space on all four sides. The proposed project does not modify other land uses in and around the area. The proposed project does not alter the ownership of land in the area. Residential and commercial property values near the project area should not be impacted by change of use added to the park. Access to the downtown, the park and residential areas to the north will still remain, thus there should be no negative impact on property values. Community livability will not be decreased as a result of the project. Future impacts to park land will need to give thought to potential mitigation and replacement if necessary, which may result in no net loss/gain from the proposed project. Due to the fact that impacts to land use are only associated the addition of the uses within this portion of the park, this resource was identified as having no impact.

FISH, WILDLIFE, AND ECOLOGICALLY SENSITIVE RESOURCES

The Project area contains a dry bedrock bluff prairie and oak/sugar maple forest which are within areas listed as having a moderate biodiversity significant by the DNR. The Project site may also contain threatened or endangered species. The current Project involves only a change in allowable land use from non-motorized transportation activities to allowing motorized OHV. No OHV trail alignments have been proposed or are being reviewed at this time. As such, a change in land use alone will not result in impacts to any of the rare features or the prairie or forested areas. If trail alignments are proposed in the future, OHV trail alignments will need to take into consideration threatened and endangered species and additional review will likely be necessary.

INVASIVE SPECIES

Invasive species do occur within the Project site. These areas have not been mapped. The current Project involves only a change in allowable land use from non-motorized transportation activities to allowing motorized OHV. No OHV trail alignments have been proposed or are being reviewed at this time. As such, a change in land use alone will not result in spread or impact on invasive species. If trail alignments are proposed in the future, OHV trail alignments will need to take into consideration the location of invasive species to prevent spreading these species.

HISTORICAL/CULTURAL RESOURCES

Initial information from SHPO databases indicated there were no historical, historic, or architectural resources within the Project area. A Phase 1 Archaeological study was completed in July 2013 (**Appendix E**) which also concluded there are no historic properties in the Project area. SHPO concurred with this conclusion in a letter dated September 5, 2013. This project will not impact historic properties.

SOCIOECONOMICS

The Project will only affect the use designation of the park to add OHV. It will not impact any private residential, commercial, office or industrial properties. There are no low income or minority populations in

the Project area itself. There are minority populations (Native American) within the regional area. No change in access is proposed with this project proposal.

IMPACTS TO POPULATIONS SERVED – INCLUDING MINORITY AND LOW-INCOME POPULATIONS

South Park is a larger facility that is intended to serve the entire Houston community, rather than a particular neighborhood or a specific activity. As such, the amenities provided at these facilities need to appeal to a wide variety of users regardless of income and race. In general, the activities at South Park are more passive in nature (trails, etc.).

The proposed change in use will not result in the loss of any of the activities at South Park and will in fact add an additional allowable use. Park patrons will be able to participate in all of the activities at the park that are currently offered and will be able to use the park for OHW purposes. These activities will be available to all users regardless of race or income.

As a community, the City of Houston has approximately 979 residents. Approximately 99.5 percent of the residents identify themselves as being “white”. Approximately 0 percent of the residents are Asian, 0.4 percent of residents are American Indian and approximately 0 percent are African American. Hispanic, Hawaiian and “other” make up 0 percent of the population. Based on these demographics, and based on the fact that both park facilities are intended to serve the entire community and county at large, it is unlikely that the proposed Project change in use will result in any particular negative impact to minority populations.

Income statistics for Houston County indicate that less than 9 percent of the population is estimated to have an income below the poverty level. That number is lower than the Twin Cities region as a whole, which is estimated at approximately 11 percent. Based on these numbers, and based on the fact that South Park is intended to serve the entire community and county at large, it is unlikely that the Project change in use will result in any particular negative impact to low-income populations.

PRECEDENT FOR FUTURE ACTION/CUMULATIVE IMPACTS

The proposal is to add additional recreational land use for motorized, OHV to South Park. There are no proposed trail alignment locations with this proposal. This action itself does not result in environmental impacts. However, the action does establish a precedent for a future action that could have environmental impacts. The site contains threatened and endangered species and erodible land. Environmental review of these issues and the location of the threatened and endangered species would need to be determined if a trail alignment is proposed. Design of a trail could minimize or avoid impact to these results with additional review and design considerations.

While this EA evaluates the proposed land use change only and not a specific trail alignment, if any future trail alignments are proposed, additional environmental review may be necessary. Additionally, any proposed trail alignments would be based on the Minnesota Department of Natural Resource’s nationally recognized *Trail Planning, Design, and Development Guidelines (2006, MnDNR)*. The City and MnDNR

know that bringing a strong knowledge base about good trail design will be key to this project because, if done without proper attention to sound trail design techniques, environmental problems could occur on the steep slopes involved in the project area. In particular, the knowledge base contained in the Trail Planning document (Section 6 “Sustainable Natural Surfaced Trails”) will be important to planning the future trail system.

In addition to the expertise of MnDNR professionals for possible trail alignments, the project will have access to the resources of the National Off Highway Vehicle Conservation Council (NOHVCC). NOHVCC cooperated with MnDNR in putting on an OHV Recreation Management Workshop in Houston in June 2011, and NOHVCC staff and volunteers are knowledgeable about the project. It is likely that the project would contract with nationally recognized professional trail designers from the 2011 workshop to assist working through sustainable trail design issues.

V. COORDINATION AND CONSULTATION

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APPENDIX A – FIGURES

APPENDIX B – AGENCY LETTERS/EARLY COORDINATION

APPENDIX C – SUMMARY OF PUBLIC COMMENTS

APPENDIX D – PHASE 1 ARCHAEOLOGICAL STUDY

APPENDIX E – NOISE STUDY